

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

MICHAEL GORDON DOUGLAS,

Defendant.

Case No.: 23-CR-80219-AMC

**GOVERNMENT'S MOTION FOR  
LEAVE TO FILE MOTION IN LIMINE  
IN EXCESS OF 20-PAGE LIMIT SET  
BY LOCAL RULE 7.1(C)(2)**

The United States files this motion for leave to exceed the 20-page limit set by Local Rule 7.1(C)(2) in its filing of a motion in limine in the case of United States v. Michael Gordon Douglas.

In support, the government states as follows:

1. The Court's trial Order directs a party to the case to file one (1) motion *in limine*.

The Order further advises that said motion can only exceed the page-limitation of the local rules with leave of the Court.

2. The government's motion in limine covers a myriad of issues including (1) a motion *in limine* and notice of its intent to introduce evidence of other child-molestation conduct as inextricably intertwined evidence; (2) a motion *in limine* and notice of its intent to introduce evidence pursuant to Federal Rules of Evidence 414 and 404(b); (2) a motion *in limine* on the admissibility of summaries of data pursuant to Federal Rule of Evidence 1006; (3) and a motion *in limine* to publish child pornography to the jury. The factual summary and specific outline of the evidence requested to be admitted that will be included is detailed and lengthy so the defendant, counsel and the Court are fully aware of the evidence. The legal analysis is likewise extensive as this motion combines multiple motions in limine into the one requested filing.

3. The government is not able to complete its response within the 20-page limit set by Local Rule 7.1(C)(2) and requests permission to exceed this limit. The government's response has been limited to the necessary facts, evidence, and legal analysis and will be 30 pages in length at most, double-spaced.

4. John Kirby, counsel for the Defendant, does not object to the response exceeding the 20-page limit of the local rules.

Respectfully submitted,

MARKENZY LAPOINTE  
UNITED STATES ATTORNEY

/s/ Gregory Schiller  
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**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that I electronically filed a copy of this document with the Clerk using CM/ECF on July 15, 2024.

*/s/ Gregory Schiller*  
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GREGORY SCHILLER

ASSISTANT UNITED STATES ATTORNEY